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Attorney for Defendant

6 *UNIVERSITY MEDICAL CENTER OF SOUTHERN NEVADA*

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

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11 SHAHEEN W. AHMAD, an individual

12 Plaintiff,

13 vs.

14 UNIVERSITY MEDICAL CENTER OF
SOUTHERN NEVADA, a political
15 subdivision of Clark County, State of Nevada;
Board of Trustee of Clark County

16 Defendants.
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Case No.: 2:15-cv-01001-GMN-NJK

**AMENDED STIPULATION AND ORDER
TO EXTEND TIME TO FILE ORDER
TO DISMISS
(First Request)**

Date Requested: November 10, 2016

18 Defendant UNIVERSITY MEDICAL CENTER OF SOUTHERN NEVADA ("UMC"), a
19 political subdivision of Clark County, State of Nevada; Board of Trustee of Clark County, by and
20 through their attorney of record, JEFFREY I. PITEGOFF, ESQ. of Morris, Sullivan, Lemkul &
21 Pitegoff, hereby stipulate and agree with Plaintiff SHAHEEN W. AHMAD, individually, by and
22 through her attorney of record, Malik W. Ahmad, Esq., of the Law Office of Malik W. Ahmad,
23 that the Defendants be allowed up to and including **November 22, 2016** to file their stipulation
24 and order for dismissal in the above-captioned matter.
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1 The original deadline to file the order dismissing the case was November 8, 2012. On that
2 day, the parties filed a stipulation and proposed order to extend the deadline to November 22,
3 2016. The Court rejected the stipulation and required the parties to resubmit a revised version in
4 compliance with the applicable local rules. In accordance with the Court's direction, the parties
5 respectfully submit this revised version.

6 As set forth above, the parties stipulate to extend the deadline for Defendants to file their
7 stipulation and order to dismiss the this case from November 8, 2016 to November 22, 2016. The
8 Defendant is a political subdivision of Clark County, Nevada; therefore, the settlement agreement
9 had to be ratified at a public meeting. Defendant's lead trial counsel, Jeffrey Pitegoff, was in a
10 month-long trial in a Nevada state court action and has also been litigating another matter in
11 Federal District Court in Indiana, which has required significant travel. Due to these scheduling
12 issues, the agreement was not finalized in time for the first available public meeting. The
13 agreement is now finalized and ratified, and payment is forthcoming.

14 The parties hoped that the above tasks would be completed by November 8, 2016 and, as
15 such, did not seek relief to extend the deadline until November 8. Accordingly, the parties submit
16 that the failure to submit this stipulation prior to the deadline was the result of excusable neglect.

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1 For all of the reasons set forth above, the parties respectfully request that the deadline to
2 dismiss the case be extended to November 22 to allow payment to issue before the dismissal is
3 entered.

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5 DATED this 10th day of November, 2016.

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7 MORRIS, SULLIVAN, LEMKUL
& PITEGOFF, LLP

8 /s/ Jeffrey I. Pitegoff

9 Jeffrey I. Pitegoff, Esq.
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12 *Attorney for Defendants*

THE LAW OFFICE OF MALIK W. AHMAD

/s/ Malik W. Ahmad

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Tel: (702) 270-9100
Attorney for Plaintiff

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15 **ORDER**

16 IT IS HEREBY ORDERED that Defendants are allowed up to and including **November 22, 2016**
17 to file to file their stipulation and order for dismissal in the above-captioned matter.

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19 DATED this 10th _ day of _ November __, 2016.



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22 UNITED STATES MAGISTRATE JUDGE